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November 3, 2024

United States Courts
Southern District of Texas
FILED

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Clerk of the Court
United States District Court
Southern District of Texas
Galveston Division
601 Rosenberg Street, Room 411
Galveston, Texas 77550

Nathan Ochsner, Clerk of Court

RE: CASE NO. 3:24-CV-00297; YELLEN et al., v. BIDEN, et al., APPROPRIATE VENUE

Plaintiffs appearing in pro se hereby files and service his letter in response to this Court's order to show proof of appropriate venue.

The private interest factors are: "(1) the relative ease of access to sources of proof; (2) the availability of compulsory process to secure the attendance of witnesses; (3) the cost of attendance for willing witnesses; and (4) all other practical problems that make trial of a case easy, expeditious and inexpensive." In re Volkswagen AG, 371 F.3d 201, 203 (5th Cir. 2004) [hereinafter In re Volkswagen I] (citing Piper Aircraft, 454 U.S. at 241 n.6, 102 S.Ct. 252. The public interest factors are: "(1) the administrative difficulties flowing from court congestion; (2) the local interest in having localized interests decided at home; (3) the familiarity of the forum with the law that will govern the case; and (4) the avoidance of unnecessary problems of conflict of laws [or in] the application of foreign law." Id.

As indicated in the case of In re Volkswagen of Am., Inc., 545 F.3d 304, 315–16 (5th Cir. 2008), the Court stated that they considered first the private interest factor concerning the relative ease of access to sources of proof. The access to some sources of proof presents a lesser inconvenience. Here the private interest does not apply as there are several defendants named in this suit alone with several issues. Defendants here are located all over the United States, from government officials, airlines, state officials, companies, and Jane/John Does, of which the plaintiffs do not know where they will be located since they have not been identified yet. Making this Court venue proper. The issues within this case are nationwide, and are not just restricted to one State or location. There will be numerous Plaintiffs in this case from all over the United States, as there are already individuals filing joinders with this Court to be added on as Plaintiffs. Plaintiffs have been informed that there will be a lot more joinders being filed. Citizens all over the US have an interest in this case as it involves them.

The second private interest factor is the availability of compulsory process to secure the attendance of witnesses. One of the main issues within Plaintiff's civil rights complaint is

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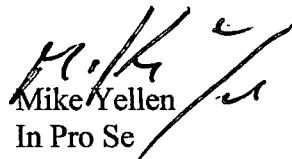
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illegals and terrorist crossing the border into the United States, which Plaintiffs contend is treason on the part of some of the named Defendants and most likely hundreds more. The location of this Court in this regard is perfect. As most of the witnesses would be border officials, since Texas has seen millions crossing the border into the United States illegally. Further, no matter what district court, all witnesses will have to travel to trial. Plaintiffs would point out that this case may not even go to trial, as Plaintiffs are planning to file a motion for summary judgment, as the evidence is quite substantial against Defendants.

The third private interest factor is the cost of attendance for willing witnesses. As indicated, no matter if this case was in D.C. or any other district, most witnesses will be required to travel. Witness will be coming from all over the United States. Furthermore, with technology counsel will be able to appear through zoom, which maybe more convent for this Court since there undoubtable be several attorneys defending against the allegation within this case. Making attendance a none factor. All weight heavily in favor of keeping this case with this Court. Plaintiffs would state that the balance of justice weighs in favor of this case being maintained with this Court, and would request that this case not be transferred and stay within this Court.

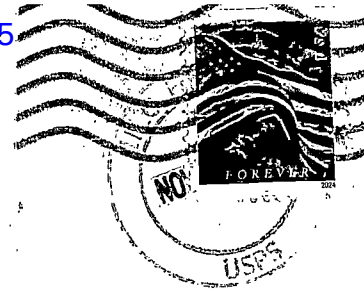
Respectfully submitted,


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